



October 31, 2006

VIA ELECTRONIC COMMENT FILING SYSTEM

Secretary of the Commission
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ET Docket 06-135, Notice of Proposed Rulemaking

Dear Madam Secretary:

Timex is pleased that the Federal Communications Commission (FCC) has proposed to allocate 2 MHz of frequency spectrum to support short-range wireless medical applications involving body-worn sensors, implantable medical devices, and associated monitoring and control equipment. Timex views this personal medical device application space as a growing field in which there will be a variety of highly useful devices relied upon by individuals of all ages. Therefore, the FCC's proposal is well-timed.

As a company with a worldwide presence, Timex is particularly interested in a spectrum band like the 401-406 MHz band that can support medical applications operating around the globe. Seventy-five hundred Timex employees are located on several continents: in Middlebury, Connecticut; Little Rock, Arkansas; Besancon, France; Pforzheim, Germany; Cebu, the Philippines; People's Republic of China; and Delhi, India. Internationally compatible operations are a worthwhile goal, as they will enable individuals to use these wireless products whether at home or overseas, and they also allow for lower-

TIMEX CORPORATION
555 Christian Road
P.O. Box 310
Middlebury, CT
06762-0310
Phone 203 346 5000
www.timex.com



cost production as the same products can be sold in multiple countries.

Timex has been designing and manufacturing watches, clocks, and other consumer goods for 150 years. The company is currently developing wristwatches and other body-worn devices that will wirelessly transmit real-time personal information, including vital sign data, to associated external equipment. Timex currently offers the Ironman BodyLink System—a body-worn network that comprises up to 4 devices that act together as a personal information monitoring system. The Ironman BodyLink System, which includes the Timex Digital Heart Rate Sensor, the Timex Speed + Distance Sensor, and the Timex Ironman Triathlon Bodylink Performance Monitor, provides comprehensive performance feedback and real-time workout data.

In view of continuing developments in wireless technologies, the proposed spectrum is needed for body area networks comprised of medical body sensors and associated therapeutic and diagnostic equipment. Given that many healthcare environments contain numerous sources of interference and noise, these devices must be able to communicate reliably. In this way, Timex supports the FCC's proposal to require frequency monitoring by medical devices that will operate in the new band at full power, while allowing low-power, low-duty-cycle operations (i.e., 3.6 seconds of transmit time in one hour) for medical devices that do not employ frequency monitoring.

It is possible that this spectrum could become quite crowded. Thus, the frequency monitoring techniques proposed by the FCC are needed



Page 3 of 3

to ensure successful communications by medical devices that will be on the air more often.

Timex encourages the to FCC promptly authorize operations as proposed in the NPRM.

Sincerely,

A handwritten signature in cursive script, reading "Louis M. Galie".

Louis M. Galie

Senior VP, Research & Strategic Development